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Attorneys for Claimants
Steven Fontaine and Niloufer Fontaine

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,
v.
REAL PROPERTY LOCATED, AT 6557
ASCOT DRIVE, OAKLAND, CALIFORNIA,

Defendants.

STEVEN FONTAINE, NILOUFER
FONTAINE, HEREFORD HUMANITARIAN
BUSINESS TRUST, HUIBERT JOHANNES
VAN PRAAG, AND LONGMEAD
PROPERTIES LIMITED,

Claimants.

Case No: C 02-4948 JSW

STIPULATION AND ORDER
EXTENDING THE FONTAINE
CLAIMANTS' TIME BY ONE
WEEK FOR FILING A REPLY
BRIEF IN SUPPORT OF THEIR
MOTION FOR A STAY OF
ENFORCEMENT OF JUDGMENT

Date: To be Submitted on Briefs Without
Oral Argument
Time: Not Applicable
Place: Courtroom 11
Judge: Hon. Jeffrey S. White

FURTHER REVISION TO BRIEFING SCHEDULE
ON FONTAINE CLAIMANTS' MOTION FOR STAY
OF ENFORCEMENT OF JUDGMENT

1 The parties agree, subject to the Court's approval, that the Fontaine claimants may have
2 an additional week, to and including July 31, 2009, to file their reply brief in support of their
3 motion to enforce the judgment in this case. Unless time is extended, the Fontaine claimants'
4 reply brief is due to be filed on or before July 24, 2009. The Fontaine claimants have not sought
5 any prior extension of time. In a previous stipulation, which the Court entered as an order on
6 July 2, 2009, the parties agreed and the Court ordered that following the submission of the briefs
7 in connection with the Fontaine claimants' motion that the Court would take the motion under
8 submission without a hearing.
9

10 The reason that the Fontaine claimants are requesting an additional week is that the
11 Fontaines' attorneys are a two-person law firm consisting of James Braden and Pamela Sieux.
12 Although Mr. Braden did the majority of the work on the opening papers on this motion, Ms.
13 Sieux also materially contributed. Moreover, Ms. Sieux has primary working responsibility for
14 many matters that the law firm handles. Ms. Sieux is currently in the last week of a vacation in
15 High River, Alberta Province, Canada, where she is entirely unavailable to perform any services.
16 It is not merely a question this week of her not being available to work on the reply brief in this
17 matter, but also that Mr. Braden must attend during her absence to other matters for which she is
18 primarily responsible. Ms. Sieux will return to the office on Monday, July 27, and will be fully
19 available to resume responsibility for those other matters, as well as to assist with preparing and
20 filing the reply brief in this matter by Friday, July 31.
21
22

23 Neither the United States nor the Investor claimants have any objection to the Fontaine
24 Claimants having a one-week extension of time to July 31 for their reply brief, as long as the
25

26 / / /

27 / / /

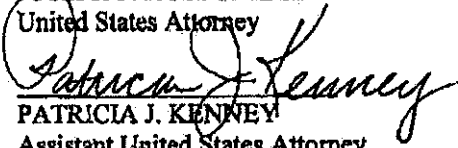
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FURTHER REVISION TO BRIEFING SCHEDULE
ON FONTAINE CLAIMANTS' MOTION FOR STAY
OF ENFORCEMENT OF JUDGMENT

Fontaine claimants do not file any motions in any court during the period from August 3 to August 7, 2009. The Fontaine Claimants agree to and accept this condition.

IT IS SO STIPULATED:

Dated: July 21, 2009

JOSEPH P. RUSSONIELLO
United States Attorney


PATRICIA J. KENNEY
Assistant United States Attorney
Attorneys for the United States

Dated: July 21, 2009

COOPER, WHITE & COOPER LLP


STEPHEN KAUB
Attorney for Claimant Hereford Humanitarian Trust

Dated: July 21, 2009

DONOVAN HATEM LLP


DARRELL MOOK
Attorney for Claimant Hereford Humanitarian Trust

Dated: July ____, 2009

CLARENCE & DYER LLP

KATE DYER
Attorneys for Claimants Huibert Van Praag
and Longmead Properties LLP

Dated: July 21, 2009


JAMES BRADEN
Attorney for Claimants Steven Fontaine
and Niloufer Fontaine

IT IS SO ORDERED PURSUANT TO THE FOREGOING STIPULATION ON THIS

__ DAY OF JULY, 2009.

HONORABLE JEFFREY S. WHITE
United States District Court

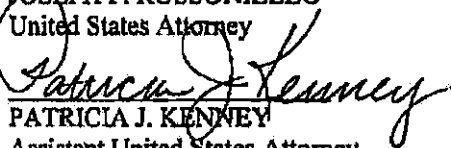
FURTHER REVISION TO BRIEFING SCHEDULE
ON FONTAINE CLAIMANTS' MOTION FOR STAY
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IT IS SO STIPULATED:

Dated: July 21, 2009

JOSEPH P. RUSSONIELLO
United States Attorney


PATRICIA J. KENNEY
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Attorneys for the United States

Dated: July ___, 2009

COOPER, WHITE & COOPER LLP

STEPEHN KAUS
Attorney for Claimant Hereford Humanitarian Trust

Dated: July ___, 2009

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Attorney for Claimant Hereford Humanitarian Trust

Dated: July 21, 2009

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KATE DYER
Attorneys for Claimants Huibert Van Praag
and Longmead Properties LLP

Dated: July 21, 2009


JAMES BRADEN
Attorney for Claimants Steven Fontaine
and Niloufer Fontaine

IT IS SO ORDERED PURSUANT TO THE FOREGOING STIPULATION ON THIS

22 DAY OF JULY, 2009.


HONORABLE JEFFREY S. WHITE
United States District Court

by the Honorable Thelton E. Henderson

FURTHER REVISION TO BRIEFING SCHEDULE
ON FONTAINE CLAIMANTS' MOTION FOR STAY
OF ENFORCEMENT OF JUDGMENT